
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: CRIMINAL COMPLAINT

v.

: Honorable Mark Falk

JERVON MORRIS,
a/k/a "Sticky"

: Mag. No. 19-3628

I, Keith Willis, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B

Keith Willis
Keith Willis, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
April 4, 2019, Essex County, New Jersey

Honorable Mark Falk
United States Magistrate Judge

M. Falk
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Narcotics)

On or about November 16, 2018, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**JERVON MORRIS,
a/k/a "Sticky,"**

knowingly and intentionally did possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWO
(Unlawful Possession of Ammunition)

On or about November 16, 2018, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**JERVON MORRIS,
a/k/a "Sticky,"**

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Hudson County, did knowingly possess in and affecting commerce 25 rounds of .40 caliber Federal Cartridge ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

ATTACHMENT B

I, Keith Willis, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about November 16, 2018, Jersey City police officers responded to the Marion Gardens housing complex following a citizen complaint of shots fired.

2. When the officers arrived to Victim 1's apartment, they observed a bullet hole in a mirror mounted on the wall of a bedroom and a .40 caliber projectile on the floor next to the bedroom door. Law enforcement determined that the shot had been fired from the apartment next door (the "Apartment") into Victim 1's apartment.

3. The officers responded to the Apartment and knocked on the door, but no one answered. Believing an armed individual might still be present within the Apartment, the officers lawfully entered the Apartment. Once inside the Apartment, the officers observed additional bullet holes and a .40 caliber spent shell casing on the floor of the living room.

4. Pursuant to a lawful search of the Apartment, law enforcement recovered from a closet, among other items, the following:

- a. One bag containing a large rock of approximately 43.9 grams of what the law enforcement officers believed to be cocaine base, based on their training and experience;
- b. Three bags containing approximately 191 vials containing what the law enforcement officers believed to be cocaine base, based on their training and experience;
- c. Two bags containing approximately 200 wax folds containing what the law enforcement officers believed to be heroin based on their training and experience;
- d. Approximately 246 rounds of ammunition, including approximately 25 rounds of .40 caliber Federal Cartridge ammunition, 41 rounds of .45 caliber ammunition, 134

rounds of 9mm ammunition, six rounds of .38 caliber ammunition, and 40 rounds of .380 caliber ammunition;

- e. A scale;
- f. Two vacuum sealing machines; and
- g. Narcotics packaging paraphernalia.

5. Subsequent laboratory testing confirmed that the approximately 191 vials and rock of suspected crack cocaine was cocaine and had an extrapolated weight of approximately 11.97 grams and 41.96 grams, respectively. Subsequent laboratory testing also confirmed that the approximately 200 wax folds of suspected heroin contained heroin, fentanyl and methamphetamine and had an extrapolated weight of approximately 8.67 grams.

6. Jersey City detectives interviewed the resident of the Apartment (the "Resident"), who stated that an individual subsequently identified as JERVON MORRIS, a/k/a "Sticky" ("MORRIS") paid the Resident for use of the Apartment to package and store narcotics for sale. Specifically, the Resident stated that MORRIS used the closet from which the above items were recovered to store narcotics. The Resident also stated that MORRIS was the only occupant of the Apartment when the Resident left the Apartment earlier that day.

7. Before being recovered in New Jersey on or about November 16, 2018, the 25 rounds of .40 caliber Federal Cartridge ammunition moved in and affected interstate commerce.

8. On or about June 28, 2013, MORRIS was convicted in the Superior Court of New Jersey, Hudson County, of Possession of Weapons for Unlawful Purpose, in violation of N.J.S.A. 2C:39-4a, a crime punishable by imprisonment for a term exceeding one year for which a sentence of eight years was imposed.